YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

1947 Galileo Court , Suite 103; Davis, CA 95618

Diesel Fired Emergency Internal Combustion Engine Emission Evaluation and Statement of Basis Addendum

ENGINEER:

Kyle Rohlfing

ATC # ____C-11-14

SIC Code # 9223 UTM E 589.4 km

COMPANY NAME:

California State Prison - Solano

UTM N 4241.6 km

ENGINE LOCATION:

The engine is located at 2100 Peabody Road in Vacaville. The engine is not located within 1,000

feet of a K-12 school and is not subject to the requirements of H&S 42301.6.

PROPOSAL:

The applicant is proposing to modify P-28-95 to increase maintenance and testing hours of

operation for the engine.

PROCESS:

The engine is used to power an emergency generator

FLOW DIAGRAM:

None required.

EQUIPMENT:

940 BHP diesel fired Mitsubishi IC engine, Model No. S12A2PT, Serial No. 10884, Model Year

1985, Non-Certified Engine

CONTROL EQUIPMENT:

Aftercooler and turbocharger

APPLICATION DATA:

Operating Schedule	<u>Units</u>	Formula Symbol	Reference
Max. Daily Operation =	24 hours/day	Td	Applicant
Max. 1st Quarter Operation =	200 hours/quarter	T1	Applicant
Max. 2nd Quarter Operation =	200 hours/quarter	T2	Applicant
Max. 3rd Quarter Operation =	200 hours/quarter	Т3	Applicant
Max. 4th Quarter Operation =	200 hours/quarter	T4	Applicant
Max. Yearly Operation =	200 hours/year	Ту	Applicant

Engine Data	<u>Units</u>	Formula Symbol	Reference
Maximum BHP Rating =	940 BHP	HP	Manufacturer's Data
Exhaust Volume =	5,880 ACFM	EV	Manufacturer's Data
Exhaust Temperature =	1,660 Degrees Rankine (F+460)) ET	Manufacturer's Data
Hourly Fuel Consumption =	46.0 Gallons	FT	Manufacturer's Data

ASSUMPTIONS:

	<u>Onits</u>	Formula Symbol	Reference
Sulfur Content of Fuel =	0.0015 %	SC	CARB Certified Diesel
Standard Temperature =	528 Degrees Rankine (F+460) ST	STAPPA-ALAPCO, Pg. 1-7 (5/30/91)
Moisture Content =	10 %	PM	STAPPA-ALAPCO, Pg. 1-7 (5/30/91)
BTU Content =	19,300 BTU/lb	BC	AP-42, Table 3.4-1(a) (10/96)
Density =	7.1 lb/gallon	DE	AP-42, Table 3.4-1(a) (10/96)
Mass Conversion =	453.6 g/lb	GM	District

Diesel Particulate Control	<u>Units</u>	Formula Symbol	Reference
Particulate Controls =	No	 	Applicant
Baseline Reduction =	0 %	CE	Manufacturer's Data

EMISSION FACTORS:

	<u>Offics</u>	<u>rormula Symbol</u>	<u>Reference</u>
VOC =	0.99 g/bhp-hr	EFvoc	Original Eval P-28-95
CO =	2.26 g/bhp-hr	EFco	Original Eval P-28-95
NOx =	10.41 g/bhp-hr	EFnox	Original Eval P-28-95
SOx =	0.0055 g/bhp-hr	EFsox	AP-42, Table 3.4-1 (10/96) *
P/PM10 =	0.74 g/bhp-hr	EFpm	Original Eval P-28-95**

Formula Combal

Linite

CALCULATIONS:

1. Determine the Permitted Diesel Fuel Limits:

Daily Diesel Limit = Td * FT =

1,104 gallons

^{*} Only the emission factor listed in Table 3.4-1 is used since it assumes all fuel bound sulfur is converted to SOx.

^{**} All particulate matter is assumed to be less than 1 micrometer aerodynamic diameter (AP-42, Section 3.3). Emission factor in g/bhp-hr calculated from factor given in lb/gal as (0.0335 lb/gal) * FT * GM / HP

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2nd Quarter Diesel Limit = T2 * FT =
                                                                                                   9,200 gallons
                                                        3rd Quarter Diesel Limit = T3 * FT =
                                                                                                   9,200 gallons
                                                         4th Quarter Diesel Limit = T4 * FT =
                                                                                                   9,200 gallons
                                                              Yearly Diesel Limit = Ty * FT =
                                                                                                   9,200 gallons
                                                                                                                          Formula
  2. Determine Dry Standard Cubic Feet of Exhaust:
                                                                                                                          Symbol
                                              DSCFM Exhaust = EV * ST/ET * (100%-PM) =
                                                                                                  1,683.2 dscfm
                                                                                                                           SCFM
  3. Determine Yearly MMBtu combusted in Engine for Toxics:
                             Yearly MMBtu = Ty * FT * DE * BC * (1 MMBtu/1,000,000 Btu) =
                                                                                                 1,260.7 MMBtu/year
 EMISSION CALCULATIONS:
 1. Determine VOC Emissions:
                              Max Daily VOC Emissions = Td * HP * EFvoc * (1 lb/453.6 g) =
                                                                                                    49.1 lb/day
                             1st Quarter VOC Emissions = T1 * HP * EFvoc * (1 lb/453.6 g) =
                                                                                                     409 lb/quarter
                            2nd Quarter VOC Emissions = T2 * HP * EFvoc * (1 lb/453.6 g) =
                                                                                                     409 lb/quarter
                            3rd Quarter VOC Emissions = T3 * HP * EFvoc * (1 lb/453.6 g) =
                                                                                                     409 lb/quarter
                            4th Quarter VOC Emissions = T4 * HP * EFvoc * (1 lb/453.6 g) =
                                                                                                     409 lb/quarter
            Max Yearly VOC Emissions = Ty * HP * EFvoc * (1 lb/453.6 g) * (1 ton/2,000 lb) =
                                                                                                    0.20 tons/year
 2. Determine CO Emissions:
                                Max. Daily CO Emissions = Td * HP * EFco * (1 lb/453.6 g) =
                                                                                                   112.6 lb/day
                               1st Quarter CO Emissions = T1 * HP * EFco * (1 lb/453.6 g) =
                                                                                                     938 lb/quarter
                              2nd Quarter CO Emissions = T2 * HP * EFco * (1 lb/453.6 g) =
                                                                                                     938 lb/quarter
                              3rd Quarter CO Emissions = T3 * HP * EFco * (1 lb/453.6 g) =
                                                                                                     938 lb/quarter
                              4th Quarter CO Emissions = T4 * HP * EFco * (1 lb/453.6 g) =
                                                                                                     938 lb/quarter
              Max. Yearly CO Emissions = Ty * HP * EFco * (1 lb/453.6 g) * (1 ton/2,000 lb) =
                                                                                                    0.47 tons/year
 3. Determine NOx Emissions:
                                Max. Hourly NOx Emissions = HP * EFnox * (1 lb/453.6 g) =
                                                                                                  21.57 lb/hour
                             Max. Daily NOx Emissions = Td * HP * EFnox * (1 lb/453.6 g) =
                                                                                                  517.8 lb/day
                            1st Quarter NOx Emissions = T1 * HP * EFnox * (1 lb/453.6 g) =
                                                                                                  4,315 lb/quarter
                            2nd Quarter NOx Emissions = T2 * HP * EFnox * (1 lb/453.6 g) =
                                                                                                  4,315 lb/quarter
                            3rd Quarter NOx Emissions = T3 * HP * EFnox * (1 lb/453.6 g) =
                                                                                                  4,315 lb/quarter
                            4th Quarter NOx Emissions = T4 * HP * EFnox * (1 lb/453.6 g) =
                                                                                                  4,315 lb/quarter
           Max. Yearly NOx Emissions = Ty * HP * EFnox * (1 \text{ lb}/453.6 \text{ g}) * (1 \text{ ton}/2,000 \text{ lb}) =
                                                                                                   2.16 tons/year
 4. Determine SOx Emissions:
                                Max. Hourly SOx Emissions = HP * EFsox * (1 lb/453.6 g) =
                                                                                                   0.01 lb/hour
                             Max. Daily SOx Emissions = Td * HP * EFsox * (1 lb/453.6 g) =
                                                                                                     0.3 lb/day
                            1st Quarter SOx Emissions = T1 * HP * EFsox * (1 lb/453.6 g) =
                                                                                                      2 lb/quarter
                           2nd Quarter SOx Emissions = T2 * HP * EFsox * (1 lb/453.6 g) =
                                                                                                      2 lb/quarter
                            3rd Quarter SOx Emissions = T3 * HP * EFsox * (1 lb/453.6 g) =
                                                                                                      2 lb/quarter
                            4th Quarter SOx Emissions = T4 * HP * EFsox * (1 lb/453.6 g) =
                                                                                                      2 lb/quarter
           Max. Yearly SOx Emissions = Ty * HP * EFsox * (1 lb/453.6 g) * (1 ton/2,000 lb) =
                                                                                                   0.00 tons/year
5. Determine TSP/PM10 Emissions:
                  Max. Hourly TSP/PM10 Ems. = HP * EFpm * (1 lb/453.6 g) * (100%-CE) \simeq
                                                                                                   1.54 lb/hour
               Max. Daily TSP/PM10 Ems. = Td * HP * EFpm * (1 lb/453.6 g) * (100%-CE) =
                                                                                                   37.0 lb/day
              1st Quarter TSP/PM10 Ems. = T1 * HP * EFpm * (1 lb/453.6 g) * (100%-CE) =
                                                                                                   308 lb/quarter
             2nd Quarter TSP/PM10 Ems. = T2 * HP * EFpm * (1 lb/453.6 g) * (100%-CE) =
                                                                                                   308 lb/quarter
             3rd Quarter TSP/PM10 Ems. = T3 * HP * EFpm * (1 lb/453.6 g) * (100%-CE) =
                                                                                                   308 lb/quarter
              4th Quarter TSP/PM10 Ems. = T4 * HP * EFpm * (1 lb/453.6 g) * (100%-CE) =
                                                                                                   308 lb/quarter
  Yearly TSP/PM10 Ems. = Ty * HP * EFpm * (1 ib/453.6 g) * (1 ton/2,000 lb) * (100%-CE) =
                                                                                                   0.15 tons/year
6. Determine Particulate Matter Emission Concentration:
                      PM Conc. = [PM lb/hr] * (7,000 grains/lb) * (1 hr/60 min) * (1/SCFM) =
                                                                                                    0.1 gr/dscf
7. Determine SOx Emission Concentration:
SOx % = [SOx lb/hr] * (385 scf/lb-mole) * (lb-mole/64 lb) * (1 hr/60 min) * (1/SCFM) * 100% =
                                                                                                0.0001 %
                                                                                                                        Formula
8. Determine Particulate Matter Emission Rate:
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Symbol

RULE & REGULATION COMPLIANCE EVALUATION:

District Rule 2.3-Ringelmann

The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

- 1. Requirement: The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:
- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

Subsuming Demonstration: The requirements of the rule can be streamlined by a Rule 3.4, New Source Review condition

Permit condition: The Permit Holder shall not discharge into the atmosphere any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-11-14]

District Rule 2.5-Nuisance

The operation is expected to comply with the rule requirement of no discharge which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or the public. A condition will not be placed on the ATC, but will be added to the PTO upon implementation.

District Rule 2.11-Particulate Matter

This rule was updated 1/13/10, however the rule has not yet been approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here.

1. Requirement:

Emission Rate (gr/dscf)	Allowable Rate (gr/dscf)	Compliance
0.1	0.1	Yes

Subsuming Demonstration: The above emission rate was calculated using the daily pm10 emission limit for Rule 3.4, New Source Review. The Rule 3.4 requirement of 0.1 gr/dscf will subsume the rule 2.11 requirement of 0.3 gr/dscf.

Subsuming Condition: The PM10 emissions from the engine shall not exceed 37.0 lb/day, 308 lb/1st calendar quarter, 308 lb/2nd calendar quarter, 308 lb/3rd calendar quarter, 308 lb/4th calendar quarter, and 0.15 tons/calendar year. [District Rule 3.4/C-11-14]

District Rule 2.12, Section A-Sulfur Compounds

This rule was updated 1/13/10, however the rule has not yet been approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here.

1. Requirement:

Emission Rate (% SOx as SO2)	Allowable Rate (% SOx as SO2)	Compliance
0.0001	0.2	Yes

Subsuming Demonstration: The emissions of sulfur oxides will be limited to the evaluated rates under Rule 3.4, New Source Review. The Rule 3.4 requirement of 0.0001% will subsume the rule 2.11 requirement of 0.2%.

Subsuming Condition: The SOx emissions from the engine shall not exceed 0.3 lb/day, 2 lb/1st calendar quarter, 2 lb/2nd calendar quarter, 2 lb/3rd calendar quarter, 2 lb/4th calendar quarter, and negligible tons/calendar year. [District Rule 3.4/C-11-14]

<u>District Rule 2.16 - Fuel Burning or Power Generation</u>

The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

1. Requirement:

<u>Pollutant</u>	<u>Allowable</u>		<u>Actual</u>		Compliance
SOx	200 I	b/hr	0.01	lb/hr	Yes
NOx	140 li	o/hr	21.57	lb/hr	Yes
PM	40 II	o/hr	1.54	lb/hr	Yes

Subsuming Demonstration: The emissions of pollutants will be limited to the evaluated rates under Rule 3.4, New Source Review. The Rule 3.4 requirements will subsume the rule 2.16 requirements.

Subsuming Conditions:

The SOx emissions from the engine shall not exceed 0.3 lb/day, 2 lb/1st calendar quarter, 2 lb/2nd calendar quarter, 2 lb/3rd calendar

quarter, 2 lb/4th calendar quarter, and negligible tons/calendar year. [District Rule 3.4/C-11-14]

The NOx emissions from the engine shall not exceed 517.8 lb/day, 4,315 lb/1st calendar quarter, 4,315 lb/2nd calendar quarter, 4,315 lb/3rd calendar quarter, 4,315 lb/4th calendar quarter, and 2.16 tons/calendar year. [District Rule 3.4/C-11-14]

The PM10 emissions from the engine shall not exceed 37.0 lb/day, 308 lb/1st calendar quarter, 308 lb/2nd calendar quarter, 308 lb/3rd calendar quarter, 308 lb/4th calendar quarter, and 0.15 tons/calendar year. [District Rule 3.4/C-11-14]

<u>District Rule 2.32-Stationary Internal Combustion Engines</u>

This rule was adopted 10/10/01 and is included in the SIP. As shown below, the source is in compliance with the requirements of the rule. The engine will have limited hours per year for maintenance operations and 200 hours per year for total use, and is therefore exempt from the rule (except Section 503) pursuant to Section 110.3. Section 503 requires that the source maintain a log of the engine's operating hours and that the log be retained for two years. This requirement will be superseded by the recordkeeping requirement of the Airborne Toxic Control Measure (see below).

1. Requirement: An owner or operator claiming an exemption under Sections 110.2 or 110.3 of this Rule shall maintain a log of operating hours for each engine. The log of operating hours shall be retained for two years and be made available to the Air Pollution Control Officer upon requeest.

Subsuming Demonstration: The record keeping requirement is less restrictive than the record keeping requirements of applicable regulations of the State of California. A more stringent record keeping condition will be added to the permit and made federally enforceable by the authority of Rule 3.4, New Source Review. A more stringent record retention condition is required by District Rule 3.8, Federal Operating Permits.

Subsuming Conditions:

The owner or operator is required to maintain a monthly log that lists the following information: emergency hours of operation, maintenance and testing hours of operation, emission testing hours of operation, initial startup hours, and fuel use through fully documented purchase records. [Title 17 CCR Section 93115 and District Rule 3.4/C-11-14]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.8, section 302.6(b)/C-11-14]

Use for annual billing Use for annual billing Use for annual billing Use for annual billing Use for annual billing

District Rule 3.4-New Source Review

]	PROPOSED EMISSION SUMM	IARY FOR NEW	OR MODIFIE	D PERMIT
	Daily			arly
VOC	49.1 lb		0.20	tons
CO	112.6 lb		0.47	tons
NOx	517.8 lb		2.16	tons
SOx	0.3 lb		0.00	tons
PM10	37.0 lb		0.15	tons
		Quarterly		
	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	409	409	409	409
CO (lb)	938	938	938	938
NOx (lb)	4,315	4,315	4,315	4,315
SOx (lb)	2	2	2	2
PM10 (lb)	308	308	308	308
	Previous quarterly poter			mit*
	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	25	25	25	25
CO (lb)	56	56	56	56
NOx (lb)	259	259	259	259
SOx (lb)	4	4	4	4
PM10 (lb)	18	18	18	18
* From PTO P-28-95				
	Historic potential em			
VOC (IF)	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	4th
VOC (lb)	25	25	25	25
CO (lb)	56	56	56	56
NOx (lb)	259	259	259	259
SOx (lb)	4	4	4	4
PM10 (lb)		18	18	18

^{*} The throughput report from 2009 documented 815 gallons of diesel fuel, which was 148 % of permitted throughput. Therefore, because the historic emissions are over 80% in at least one year out of the last five, the historic potential equals the previous potential to emit.

		BACT		
<u>Pollutant</u>	<u>Trigger</u> (lb/day)	Proposed (lb/day)	Quarterly Increase	BACT Trigger
VOC	10	` 49 ´	No*	No
CO	250	113	No*	No
NOx	10	518	No*	No
SOx	80	0	No*	No
PM10	80	37	No*	No

^{*} The engine was previously limited by the permit only in the hours for maintenance and testing operation with no limit for emergency use operation. Because the modified permit will now limit operation for any reason to 200 hours per year, the District expects there will not be a quarterly increase in potential to emit for any pollutant.

OFFSETS

	Quarterly permitted emissions for other permits at the stationary source*					
	<u>1st</u>	2nd	3rd	4th		
VOC (lb)	19,839	19,946	20,142	20,096		
CO (lb)	44,306	44,612	44,918	44.918		
NOx (lb)	35,187	35,515	35,781	35.781		
SOx (lb)	499	507	510	510		
PM10 (lb)	4,621	4,658	4,709	4,700		

^{*} Per Policy 28, the calculated PTE for all other permitted units not including emergency-use IC engines.

Quarterly permitted emissions for the stationary source including proposed emissions*

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	19,839	19,946	20,142	20.096
CO (lb)	44,306	44,612	44,918	44,918
NOx (lb)	35,187	35,515	35,781	35,781
SOx (lb)	499	507	510	510
PM10 (lb)	4,621	4,658	4,709	4,700

^{*} Per Policy 28, since the proposed IC engine is to be used for emergency purposes, the unit's proposed PTE will not be included in the facility's total quarterly PTE calculations.

<u>Offset triggers</u>									
<u>1st</u>	<u>2nd</u>	3rd	<u>4th</u>						
7,500	7,500	7,500	7,500						
49,500	49,500	49,500	49,500						
7,500	7,500	7,500	7.500						
13,650	13,650	13.650	13,650						
13,650	13,650	13,650	13,650						
	<u>1st</u> 7,500 49,500 7,500 13,650	1st 2nd 7,500 7,500 49,500 49,500 7,500 7,500 13,650 13,650	1st 2nd 3rd 7,500 7,500 7,500 49,500 49,500 49,500 7,500 7,500 7,500 13,650 13,650 13,650						

	Quantity of	offsets requir	ed *	
	<u>1st</u>	2nd	3rd	<u>4th</u>
VOC (lb)	0	0	0	0
CO (lb)	0	0	0	0
NOx (lb)	0	0	0	0
SOx (lb)	0	0	0	0
PM10 (Ib)	0	0	0	0

^{*} The engine meets the requirements of District Rule 3.4, Section 110 and is exempt from offset requirements.

MAJOR MODIFICATION

Facility Total Potential to Emit*	Major Source Thresholds
36.93 TPY VOC	25 TPY VOC
83.38 TPY CO	100 TPY CO
78.73 TPY NOx	25 TPY NOx
1.10 TPY SOx	100 TPY SOx
9.87 TPY PM10	100 TPY PM10

^{*} See attached quarterly PTE determination

Last five year emission aggregate*	Major Modification Thresholds
0.79 TPY VOC	25 TPY VOC
2.46 TPY CO	100 TPY CO
13.14 TPY NOx	25 TPY NOx
0.01 TPY SOx	40 TPY SOx
1.03 TPY PM10	25 TPY PM10

^{*} See attached 5 year aggregate worksheet

Result: The proposed modification is not a major modification

PUBLIC NOTICE

"Increase in historic potential to emit"

Exemption level for notification

384 lb VOC/quarter 882 lb CO/quarter 4,056 lb NOx/quarter -2 lb SOx/quarter 290 lb PM10/quarter

7,500 lb VOC/quarter 49,500 lb CO/quarter 7,500 lb NOx/quarter 13,650 lb SOx/quarter 13,650 lb PM10/quarter

Result: Public notice is not required

1. Requirement:

The VOC emissions from the engine shall not exceed 49.1 lb/day, 409 lb/1st calendar quarter, 409 lb/2nd calendar quarter, 409 lb/3rd calendar quarter, 409 lb/4th calendar quarter, and 0.20 tons/calendar year. [District Rule 3.4/C-11-14]

2. Requirement:

The CO emissions from the engine shall not exceed 112.6 lb/day, 938 lb/1st calendar quarter, 938 lb/2nd calendar quarter, 938 lb/3rd calendar quarter, 938 lb/4th calendar quarter, and 0.47 tons/calendar year. [District Rule 3.4/C-11-14]

3. Requirement:

The NOx emissions from the engine shall not exceed 517.8 lb/day, 4,315 lb/1st calendar quarter, 4,315 lb/2nd calendar quarter, 4,315 lb/3rd calendar quarter, 4,315 lb/4th calendar quarter, and 2.16 tons/calendar year. [District Rule 3.4/C-11-14]

4. Requirement:

The SOx emissions from the engine shall not exceed 0.3 lb/day, 2 lb/1st calendar quarter, 2 lb/2nd calendar quarter, 2 lb/3rd calendar quarter, 2 lb/4th calendar quarter, and negligible tons/calendar year. [District Rule 3.4/C-11-14]

5. Requirement:

The PM10 emissions from the engine shall not exceed 37.0 lb/day, 308 lb/1st calendar quarter, 308 lb/2nd calendar quarter, 308 lb/3rd calendar quarter, 308 lb/4th calendar quarter, and 0.15 tons/calendar year. [District Rule 3.4/C-11-14]

6. Requirement:

The maximum diesel fuel consumption of the engine shall not exceed 1,104 gallons/day, 9,200 gallons/1st calendar quarter, 9,200 gallons/2nd calendar quarter, 9,200 gallons/3rd calendar quarter, 9,200 gallons/4th calendar quarter, and 9,200 gallons/calendar year. [District Rule 3.4/C-11-14]

7. Requirement:

The source is not allowed to operate the engine more than 200 hours per calendar year. [District Rule 3.4, Section 110.2/C-11-14]

8. Requirement

The source is not allowed to operate the engine for the supplying of power to a serving utility for distribution on the grid. [District Rule 3.4, Section 110.3/C-11-14]

9. Requirement:

Other than for maintenance and testing purposes, the source is limited to operating the engine only for actual interruptions of electrical power by the serving utility. [District Rule 3.4, Section 110.4/C-11-14]

10. Requirement:

The Permit Holder shall not discharge into the atmosphere any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-11-14]

11. Requirement:

The engine shall only be fueled with CARB certified diesel fuel. [District Rule 3.4/C-11-14]

12. Requirement:

The Permit Holder shall install and maintain a non-resettable hour meter with a minimum display capability of 9,999 hours. [District Rule 3.4/C-11-14]

13. Requirement:

The Permit Holder shall not operate the IC engine more than 40 hours per calendar year for maintenance and testing purposes, and such operation shall be scheduled in cooperation with the District so as to limit air quality impact. [District Rule 3.4/C-11-14]

14. Requirement:

The owner or operator is required to maintain a monthly log that lists the following information: emergency hours of operation, maintenance and testing hours of operation, emission testing hours of operation, initial startup hours, and fuel use through fully documented purchase records. [Title 17 CCR Section 93115 and District Rule 3.4/C-11-14]

District Rule 3.8-Federal Operating Permits

This rule implements the requirements of Title V of the Federal CAA as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

The source is in compliance with the requirements of this rule. The source currently has one proposed change for which the District is issuing an ATC, which is being processed according to the District's Enhanced NSR guidelines in District Rule 3.4, Section 404.

In accordance with District Rule 3.8, section 409, a minor permit modification requires that the District provide written notice, proposed permit, and District Analysis to the USEPA, California Air Resources Board, all interested parties and agencies, and the source. The proposed permit will have the required regulatory review period.

Upon implementation of the District ATC into a PTO, the source may submit a written request for District action to amend the Title V operating permit pursuant to District Rule 3.8, section 404.1. Since the District ATC has been processed according to enhanced NSR guidelines, upon written request by the source, the District shall incorporate the changes into the Title V permit as an administrative permit amendment pursuant to District Rule 3.8, section 412.1.

1. Requirement:

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.8, section 302.6(b)/C-11-14]

District Rule 3,20-Ozone Transport Mitigation

This emissions unit is exempt from Rule 3.4, Sections 302 and 303. Therefore, per Section 110.3 of this rule, this application is exempt from the requirements of this rule.

New Source Performance Standards-40 CFR, Part 60, Subpart IIII (Stationary Compression Ignition Internal **Combustion Engines)**

The engine is not subject to the NSPS subpart based on the date of engine installation.

National Emission Standards for Hazardous Air Pollutants-40 CFR, Part 63, Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines)

The engine is located at an area source of HAP and is therefore subject the this NESHAP subpart. According to section 63.6590(b)(3) this engine does not have to meet the requirements of this subpart because it is an existing institutional emgency stationary engine.

Title 17 CCR Section 93115-Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines The regulation requires that the engine comply with the following conditions that will be placed on the permit under the authority of

Rule 3.4, New Source Review:

- The engine owner or operator will only refuel the engine with California Air Resources Board certified diesel fuel.
- Per the ATCM amendments that became effective on May 19, 2011 (Section 93115.6 (b)(3)(A)(1)(a), owners or operators of in-use emergency engines located at healthcare facilities that have a PM emission factor greater than 0.40 g/bhp-hr, shall not operate the engine more than 40 hours per year for certification, maintenance, and testing purposes. The District has determined that the California State Prison - Solano qualifies as a healthcare facility becuase it provide healthcare services to inmates separate from the California Medical Facility.
- A non-resettable hour meter shall be installed with a minimum display capability of 9,999 hours.
- The owner or operator is required to maintain a monthly log that lists the following information: emergency hours of operation, maintenance and testing hours of operation, emission testing hours of operation, initial startup hours, and fuel use through fully documented purchase records.

District Risk Management Plan and Risk Assessment Guidelines (RMPRAG)

The engine was previously limited by the permit only in the hours for maintenance and testing operation with no limit for emergency use operation. Because the modified permit will now limit operation for any reason to 200 hours per year, the District expects there will not be an increase in emissions of any hazardous air pollutants. As allowed by the RMPRAG policy, no toxics review is required for the facility.

COMMENTS: -BACT is not triggered -T-BACT is not triggered

-NSR public notice is not required

-Offsets are not required

-Rule 3.20 mitigation is not required -Title V regulatory notice is required

RECOMMENDATIONS:

Perform the regulatory notice

Engineer:

Date: 7/18/11

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

Quarterly Potential To Emit Determination **New Source Review**

Evaluation to be used on existing permits to obtain their quarterly PTE.

Engineer/Evaluator: Kyle Rohlfing

9223 SIC Code #

Date of Initial Quarterly PTE Determination: 09/18/1998

Date of Previous Quarterly PTE Determination: 04/08/2011

Date of Current Quarterly PTE Determination: 06/20/2011 Facility Name: California Medical Facility, California State Prison - Solano, and Prison Industry Authority

Location: 1600 California Drive and 2100 Peabody Road; Vacaville, CA

PTO's

CURRENT APPLICATIONS: ATC's C-11-16, C-11-17 C-11-15, C-11-16, C-11-17

			2	VOC Emissions	ns	-		CO Emisei	nieeione		-		10.00												
	Current	OTR 1	OTR	OTR 3	TR 4	_	_	_	5 —	_		-	<u> 5</u> –	2 -	_) 	ō -	_		-	PM10 E		-	
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Coating: Metal Parts	P-41-88(a1)	1,067	1,053	1.108	1,062	2.10	0	0		0			0				, ,				100			ZU6 0.40	2 9
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Enclosed Steel Shot Blasting	P-42-88	0	0	0	0	0.00								2	8 6	۷ ۵	۷ د	, ,		_					9 ;
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Institutional Laundry	P-55-97	8	¥	8		90.0		135						842	9. 4	> <	> <	۰ -		_					2
Coating: Automotive	P-133-95	2,153	2,153	2,153		523								2	- 6	* (4 0	4 (4 (<u>ლ</u>
Coating: Automotive	P-53-88(a)	1,619	1.637	1,655		217	• •							> (0.00	<u> </u>	0	0		_					Ξ
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California State Prison - Solano	Solano																								
Coating: Wood Products	P-3-90	1,040	1,040	1,040	1,040	0.52	0	0	0			-	-	•	8	-	c	•		_					
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Emergency IC Engine (960 BHP)	P-27-95(a)	103	103	103		_	847 8		47 847		5,854	5,854	5,854	5,854	2.93	2	2	2		⊦					3 1
Emergency IC Engine (940 BHP)	P-28-95(a)	409	409	409	409 (0.20	938					4,315		4.315	2.16	0	٥			_					- 4
Emergency IC Engine (960 BHP)	P-29-95(a)	103	103	103		90.0					5,854		5,854	5.854	2.93	1 0	۱ ۸	1 0		_	348	348	348 348		0 1
Emergency IC Engine (940 BHP)	P-30-95(a)	409	409	409	409 (0.20	938		38 938	8 0.47	-				2.16	0	6								- 6
Emergency IC Engine (750 BHP)	P-31-95(a)	326	326	356	356 (0.18	816 8	816 8	816 816		_				188	۱ ،				_			300		n (
Emergency IC Engine (415 BHP)	P-64-04	19	9	19	19	10.0	83				_			808	0.40	ج ،	1 %	4 7		_					,
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CSP Post-Project PIA Total PTE	A Total PTE	3,342	3,342	3,342			4,534.07 4,534	107	4,534.07 4,534.07	4.07 2.27	25,165.90	90 25,165.90				45.44	45.44								, 4
CSP Policy 25 Post-Project PIA Total PTE	A Total PTE	1,859	1,859	1,859	1,859 (0.98	0.00	0.00	0.00 0.00	00.00	0.00	00.0				000	000								
California Medical Facility	>															8	8			+-			_		,
Coating: Metal Parts & Wood Products	P-72-88	4,069	4,069	4.069	4.069	8.10	0					•	c	c	8	c	•	c							
Non-Retail GDF	P-42-90(a3)	22	22	18		0.11	. 0			200		0 0	> <		8 8	> <	> <	> •	5 6	0.00	o (·	0	0.00	_
Woodworking	P-37-92	C	_	_		2							9 (0	0.0	>	>	>		_					0
IC Engine Co-Generation	P-130-05(a)	5 574	0 0 0	9 44							_			0	0.00	0	0	0		_					0
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Roller (AA 8 MMSh./hr)	300	200	999	# :		_		7,510 7,5	7,510 7,510		_			4,336	6.86	28	29	28		_					0
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		12,378	6	Ę.	5 12	5 5	3 1	- 1	12,641	12,641	12.378	
P-12-00	E (Ib/year)	E (Ib/year)	P-131-95	P-132-95	P-203-95	D.7.09/a)	1000	00-81-1	Otal PIE	Total PTE	Total PTE	
	CMF Pre-Project SSPE (lb/year)	CMr Post-Project SSPE (Ib/year)							CMr Fre-Project PIA Iotal PIE	CMF Post-Project PIA Total PTE	CMF Policy 25 Post-Project PIA Total PTE	
Į.	WE Pre-Pi	Mr Post-P	ne (429 BH)	ne (469 BHF	Te (375 BHF	16 (2847 BH	TO (1102 BL	CALL DATE	CMT Pre-P	MF Post-P	r 25 Post-P.	
Boiler (12.6 MMBtu/hr)	ځ ک	اد	Emergency IC Engine (429 BHP)	Emergency IC Engine (469 BHP)	Emergency IC Engine (375 BHP)	Emergency IC Engine (2847 BHD)	Emergency IC Engine (1102 BUD)	N N	- (נ	CMF Policy	
Boiler (1:			Emerger	Emerger	Emerger	Emergen	Fmerger	i i			_	

NSR Triggers Luarter #3 Ouarter #4	Below	SSPE Comparison to Rule 3.20 Triggers Annual Above Above
Comparison to	Above Above Below Below	Annual Above Above Above
PTE (Below Below Below	SSPE Co
OFFSET THRESHOLDS (lb/qt) 7.500	49,500 7,500 13,650 13,650	MITIGATION THRESHOLDS (lb/year). 20,000 20,000
4	44,918 83.38 35,781 78.73 510 1.10 4,700 9.87	If to Emit (SSPE) Yearly 72,120 124,719
ia	44,918 35,781 510 4,709	ource Potential
Facility Quarterly Potent Quarter #2 Quarter #3	44,612 35,515 507 4,658	Stationary Sc
Quarter #	CO 44,306 NOx 35,187 SOx 499 M10 4,621	Post-project Stationary Source Pot voc Nox
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COMMENTS: This quarterly PTE evaluation was updated for the Prison Industry Authority ATC application C-10-123 (Graphic Arts Operation).

Engineer:

Reviewed by:

Date: 7 Date:

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

1947 Galileo Ct., Suite #103, Davis, Ca 95616

New Source Review Last Five Year Activity

Evaluator: Kyle Rohlfing

SIC Code #

Date of Initial Determination: Date of Previous Determination:

03/21/2003

Facility Name: CMF, CSP, and PIA

Date of Current Determination:

04/18/2011 06/20/2011

Location: 1600 California Drive and 2100 Peabody Road; Vacaville, CA

Facility	Process	Issued	Date PTO	ATC	Date ATC	voc	СО	NOx	SOx	PM10
		Permits	issued		Issued	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
CSP	Coating: Automotive	P-53-88	-	(⊕);	-	2.88	0.00	0.00	0.00	0.06
PIA	Metal Grinding	P-48-97	11/05/1997	C-97-47	06/05/1997	0.00	0.00	0.00	0.00	0.06
CMF	Non-Retail GDF	P-42-90(a)	12/22/1997	C-97-112	11/17/1997	0.05	0.00	0.00	0.00	0.00
PIA	Institutional Laundry	P-55-97	12/22/1997	A-54-97	12/22/1997	0.06	0.23	1.11	0.01	0.13
PIA	Coating: Metal Parts	P-41-88(a)	10/06/1999	C-99-80	07/28/1999	0.68	0.34	1.60	0.01	1.05
CMF	Boiler (44.8 MMBtu/hr) a	P-9-00	05/26/2000	C-99-102	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (44.8 MMBtu/hr) a	P-10-00	05/26/2000	C-99-103	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (39.5 MMBtu/hr) a	P-11-00	05/26/2000	C-99-104	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (12.6 MMBtu/hr) b	P-12-00	05/26/2000	C-99-105	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	IC Engine Co-Generation	P-130-95(a)	03/27/2003	C-03-46	03/25/2003	0.00	10.33	0.00	0.00	0.04
CMF	Emergency IC Engine	P-7-98(a)	04/24/2003	C-03-21	03/07/2003	0.01	0.06	2.68	0.11	0.01
CSP	Emergency IC Engine	P-64-04	09/28/2004	C-02-360	05/20/2003	0.01	0.04	0.40	0.02	0.01
PIA	Coating: Metal Parts c	P-41-88(a1)	11/12/2004	C-02-142	09/29/2003	0.00	0.36	0.00	0.00	0.00
PIA	Coating: Metal Parts c	P-22-04	03/26/2004	C-03-75	09/29/2003	-	-	-	_	_
CMF	Non-Retail GDF	P-42-90(a1)	09/09/2005	C-05-35	06/08/2005	0.02	0.00	0.00	0.00	0.00
PIA	Metal Grinding d	P-48-97(a)		C-05-93	CANCELED	-	-	-	-	-
PIA	Letterpress and Silkscreen	P-77-92(a)	€.	C-06-64	05/21/2007	0.00	0.00	0.00	0.00	0.00
CMF	Emergency IC Engine	P-70-07	-	C-07-124	11/02/2007	0.03	0.13	1.09	0.00	0.02
PIA	Mcoating: Metal Parts	Ħ	5	C-07-176	08/05/2008	0.00	0.00	0.00	0.00	0.00
CSP	Emergency IC Engine	=	40	C-08-258	01/07/2010	0.03	0.14	0.00	0.01	0.00
CMF	Non-Retail GDF	P-42-90(a2)	01/07/2010	C-09-53	03/24/2009	0.00	0.00	0.00	0.00	0.00
	Non-Retail GDF	P-42-90(a3)	06/03/2010	C-09-159	02/01/2010	0.04	0.00	0.00	0.00	0.00
	Coating: Automotive	P-53-88(a)	12/20/2010	C-10-30	10/29/2010	0.00	0.00	0.00	0.00	0.22
	Letterpress and Silkscreen	P-77-92(a1)	-	C-10-123	PENDING	0.00	0.00	0.00	0.00	0.00
	Emergency IC Engine	P-27-95(a)	-	C-11-13	PENDING	0.05	0.42	2.93	0.00	0.17
	Emergency IC Engine	P-28-95(a)	-	C-11-14	PENDING	0.20	0.47	2.16	0.00	0.15
	Emergency IC Engine	P-29-95(a)	-	C-11-15	PENDING	0.05	0.42	2.93	0.00	0.17
	Emergency IC Engine	P-30-95(a)	-	C-11-16	PENDING	0.20	0.47	2.16	0.00	0.15
CSP	Emergency IC Engine	P-31-95(a)		C-11-17	PENDING	0.18	0.41	1.88	0.00	0.13
					TOTAL	0.79	2.46	13.14	0.01	1.03

^{a.} Split of P-8-72(a) into C-99-102, C-99-103, and C-99-104 with no emission aggregate.

COMMENTS:

These permits are sorted by the ATC issuance dates. According to Rule 3.4 Section 221, a major modification is calculated based on all creditable increases and decreases from the source over the period of five consecutive years before the application, including the calendar year of the most recent application. Since ATC applications C-11-13 through C-11-17 were received on January 7, 2011, the applicable 5-year period ranges from January 2006 to January 2011.

Engineer:

Reviewed by:

F:\ENGINEER\Permits\ATCs\Evals\NSR\PTE\CMF-CSP-PIA.5 yr, 06-20-11

b. PTO P-89-89 replaced with equipment authorized by C-99-105 with no emission aggregate.

c. Split of P-41-88(a) into C-02-142 and C-03-75. Because C-02-142 and C-03-75 are part of a cap, the emission aggregate represented under C-02-142.

d. ATC C-05-93 and PTO P-48-97 canceled on 3/8/2006; operation deemed exempt from air quality permitting.